

# **EXHIBIT 50**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION FILE

No. 1:17-cv-2989-AT

**STATE DEFENDANTS' RESPONSES TO CURLING  
PLAINTIFFS' FIRST REQUESTS FOR ADMISSION**

In accordance with Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendants Brad Raffensperger, Rebecca N. Sullivan, Sara Tindall Ghazal, Anh Le, and Matthew Mashburn (collectively, the “State Defendants”), by and through their counsel of record, hereby respond and object to Curling Plaintiff’s First Requests for Admission.

**PRELIMINARY STATEMENT**

State Defendants do not waive, intentionally or otherwise, any attorney-client privilege, work-product immunity, joint defense or common-interest privilege or any other privilege, immunity, or other protection that may be asserted to protect information from disclosure. Any admissions made herein, particularly as to the

one or more components of the DRE system.

**RESPONSE:** State Defendants object to this request as it seeks responses pertaining to claims that Plaintiffs now admit are moot. State Defendants object to this request as vague and ambiguous regarding what is meant by removable media “connected at some point” and the term “components” as it pertains to the eNet System and DRE System. As such, State Defendants cannot truthfully admit or deny this request as phrased. As State Defendants have already stated, eNet is separate from the DRE system.

65. Admit that security deficiencies or vulnerabilities identified by Fortalice with the eNet System have not been fully mitigated.

**RESPONSE:** State Defendants object to this request as outside the scope of Rule 36 because it does not pertain to the truth of any matter relevant to Curling Plaintiffs’ claims in this case, and thus is an improper use of a request for admission.

66. Admit that in some jurisdictions in Georgia, the same County IT infrastructure is being used to copy data in and out of the new Dominion EMS system as was used with the GEMS System.

**RESPONSE:** State Defendants object on the basis that the request itself

Defendants further object to this request as outside the scope of Rule 36 because it does not pertain to the truth of any matter relevant to Curling Plaintiffs' claims in this case, and thus is an improper use of a request for admission. State Defendants deny this request.

Submitted this 23rd day of November, 2021.

/s/ Vincent R. Russo

Vincent R. Russo

Georgia Bar No. 242628

vrusso@robbinsfirm.com

Josh Belinfante

Georgia Bar No. 047399

jbelinfante@robbinsfirm.com

Carey A. Miller

Georgia Bar No. 976240

cmiller@robbinsfirm.com

Alexander Denton

Georgia Bar No. 660632

adenton@robbinsfirm.com

Robbins Alloy Belinfante Littlefield LLC

500 14th Street, N.W.

Atlanta, Georgia 30318

Telephone: (678) 701-9381

Bryan P. Tyson

Georgia Bar No. 515411

btyson@taylorenghish.com

Jonathan D. Crumly

Georgia Bar No. 199466

jcrumly@taylorenghish.com

James A. Balli

Georgia Bar No. 035828

jballi@taylorenghish.com  
Diane F. LaRoss  
Georgia Bar No. 430830  
dlaross@taylorenghish.com  
Bryan F. Jacoutot  
Georgia Bar No. 668272  
bjacoutot@taylorenghish.com  
Loree Anne Paradise  
Georgia Bar No. 382202  
lparadise@taylorenghish.com  
TAYLOR ENGLISH DUMA LLP  
1600 Parkwood Circle, Suite 200  
Atlanta, GA 30339  
Telephone: 678-336-7249

Counsel for State Defendants